

March 15,2003

Ms. Gayle Pahmeier
Kimball Industrial Complex
flexcel - Jasper 16th Street
1180 East 16th Street
Jasper, IN 47549

Dear Ms. Pahmeier:

Re: Exempt Construction and Operation Status,
037-16046-00100

The application from Jasper Furniture Company, received on September 3, 2002, has been reviewed. Additional information was submitted on December 4, 2002, December 23, 2002 and February 19, 2003. On December 26, 2002, in administrative amendment number 037-16887, Jasper Furniture Company changed the operating name to flexcel - Jasper 16th Street. Based on the data submitted and the provisions in 326 IAC 2-1.1-3, it has been determined that the following wood surface coating operation, to be located at 1180 East 16th Street, Jasper, Indiana, is classified as exempt from air pollution permit requirements:

- (a) One (1) diptank, venting to a 24" stack. Capacity: 135 gallons waterbased dip per year.
- (b) One (1) twenty (20) foot spray booth, identified as SB 10A, modified in 2003 to a downdraft booth with one (1) 1.075 mmBTU/hr natural gas-fired air makeup unit and an enclosed thirty (30) foot flash-off tunnel with one (1) 1.075 mmBTU/hr natural gas-fired air makeup unit.
- (c) One (1) twenty (20) foot spray booth, identified as SB 13A, modified in 2003 to a downdraft booth with one (1) 1.075 mmBTU/hr natural gas-fired air makeup unit and an enclosed twenty (20) foot flash-off tunnel.

The following conditions shall be applicable:

- 1. Pursuant to 326 IAC 5-1-2 (Opacity Limitations) except as provided in 326 IAC 5-1-3 (Temporary Alternate Opacity Limitations), opacity shall meet the following:
 - (a) Opacity shall not exceed an average of thirty percent (30%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
 - (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of 15 minutes (60 readings) in a 6-hour period as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor in a six (6) hour period.

2. Pursuant to 326 IAC 6-1-2(a) (Particulate Emissions Limitations: General Sources), facilities shall not allow or permit discharge to the atmosphere of any gases which contain particulate matter in excess of 0.07 gram per dry standard cubic meter (g/dscm)(0.03 grain per dry standard cubic foot (dscf)).
3. Pursuant to 326 IAC 6-3-2 (Process Operations) the particulate from the SB 10A and SB 13A shall be limited by the following:

Interpolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67} \quad \text{where } E = \text{rate of emission in pounds per hour and} \\ P = \text{process weight rate in tons per hour}$$

The dry filters shall be in operation at all times the SB 10A and SB13A is in operation, in order to comply with this limit.

4. Pursuant to 326 IAC 8-2-12 (Wood Furniture and Cabinet Coating), the surface coating applied to wood furniture and cabinets shall utilize one of the following application methods:

Airless Spray Application
Air Assisted Airless Spray Application
Electrostatic Spray Application
Electrostatic Bell or Disc Application
Heated Airless Spray Application
Roller Coating
Brush or Wipe Application
Dip-and-Drain Application

High Volume Low Pressure (HVLP) Spray Application is an accepted alternative method of application for Air Assisted Airless Spray Application. HVLP spray is the technology used to apply coating to substrate by means of coating application equipment which operates between one-tenth (0.1) and ten (10) pounds per square inch gauge (psig) air pressure measured dynamically at the center of the air cap and at the air horns of the spray systems.

5. The following Wood Furniture Manufacturing Operations NESHAP Subpart JJ is applicable to the modification of SB10A and SB13A. The final applicability will be issued in the Part 70 Operating permit T037-7356-00100:

Emission Limitations and Standards [326 IAC 2-7-5(1)]

1.1 General Provisions Relating to HAPs [326 IAC 20-1-1][40 CFR 63, Subpart A]

The provisions of 40 CFR 63, Subpart A - General Provisions, which are incorporated as 326 IAC 20-1-1, apply to the facility described in this section except when otherwise specified in 40 CFR 63, Subpart JJ.

1.2 Wood Furniture Manufacturing Operations NESHAP [326 IAC 20-14-1] [40 CFR Part 63, Subpart JJ]

- (a) The wood furniture manufacturing operations are subject to 40 CFR Part 63, Subpart JJ, which is incorporated by reference as 326 IAC 20-14-1, with a compliance date of November 21, 1997. A copy of this rule is attached.
- (b) Pursuant to 40 CFR 63, Subpart JJ, the wood furniture coating operations shall comply with the following conditions:
 - (1) Limit the Volatile Hazardous Air Pollutants (VHAP) emissions from finishing operations as follows:
 - (A) Achieve a weighted average volatile hazardous air pollutant (VHAP) content across all coatings of one (1.0) pound VHAP per pound solids; or
 - (B) Use compliant finishing materials in which all stains, washcoats, sealers, topcoats, basecoats and enamels have a maximum VHAP content of one (1.0) pound VHAP per pound solid, as applied. Thinners used for on-site formulation of washcoats, basecoats, and enamels have a three percent (3.0%) maximum VHAP content by weight. All other thinners have a ten percent (10.0%) maximum VHAP content by weight; or
 - (C) Use a control device to limit emissions to one (1.0) pound VHAP per pound solids; or
 - (D) Use a combination of (A), (B), and (C).
 - (2) Limit VHAP emissions contact adhesives as follows:
 - (A) For foam adhesives used in products that meet the upholstered seating flammability requirements, the VHAP content shall not exceed one and eight tenths (1.8) pound VHAP per pound solids.
 - (B) For all other contact adhesives (except aerosols and contact adhesives applied to nonporous substrates) the VHAP content shall not exceed one (1.0) pound VHAP per pound solids.
 - (C) Use a control device to limit emissions to one (1.0) pound VHAP per pound solids.
 - (3) The strippable spray booth material shall have a maximum VOC content of eight-tenths (0.8) pounds VOC per pound solids.

1.3 Work Practice Standards [40 CFR 63.803]

The owner or operator of an affected source subject to this subpart shall prepare and maintain a written work practice implementation plan within sixty (60) calendar days after the compliance date. The work practice implementation plan must define environmentally desirable work practices for each wood furniture manufacturing operation and at a minimum address each of the following work practice standards as defined under 40 CFR 63.803:

- (a) Operator training course.
- (b) Leak inspection and maintenance plan.
- (c) Cleaning and washoff solvent accounting system.
- (d) Chemical composition of cleaning and washoff solvents.
- (e) Spray booth cleaning.
- (f) Storage requirements.
- (g) Conventional air spray guns shall only be used under the circumstances defined under 40 CFR 63.803(h).
- (h) Line cleaning.
- (i) Gun cleaning.
- (j) Washoff operations.
- (k) Formulation assessment plan for finishing operations.

Compliance Determination Requirements [326 IAC 2-1.1-11] [326 IAC 2-7-6(1)]

1.4 Testing Requirements [326 IAC 2-1.1-11] [326 IAC 2-7-6(1)] [40 CFR 63]

- (a) Pursuant to 40 CFR 63, Subpart JJ, if the Permittee elects to demonstrate compliance using 63.804(a)(3) or 63.804(c)(2) or 63.804(d)(3) or 63.804(e)(2), performance testing must be conducted in accordance with 40 CFR 63, Subpart JJ and 326 IAC 3-6.

1.5 Volatile Organic Compounds (VOC)

Compliance with the VOC content and usage limitations contained in Condition 4 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) using formulation data supplied by the coating manufacturer.

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

1.6 Monitoring

- (a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, daily observations shall be made of the overspray while one or more of the booths are in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit. The Section C - Compliance Monitoring Plan - Failure to Take Response Steps will be issued in the Part 70 Operating Permit T037-7356-00100.
- (b) Weekly inspections shall be performed of the coating emissions from the stack and the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when a noticeable change in overspray emissions, or evidence of overspray emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit. The Section C - Compliance Monitoring Plan - Failure to Take Response Steps will be issued in the Part 70 Operating Permit T037-7356-00100.
- (c) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan. The Preventive Maintenance Plan will be issued in the Part 70 Operating Permit T037-7356-00100.

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

1.7 Record Keeping Requirements

- (a) To document compliance with Condition 5(1.1) and (1.2), the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be complete and sufficient to establish compliance with the VHAP usage limits established in Condition 5(1.2).
 - (1) Certified Product Data Sheet for each finishing material, thinner, contact adhesive and strippable booth coating.
 - (2) The HAP content in pounds of VHAP per pounds of solids, as applied, for all finishing materials and contact adhesives used.
 - (3) The VOC content in pounds of VOC per pounds of solids, as applied, for each strippable coating used.
 - (4) The VHAP content in weight percent of each thinner used.
 - (5) When the averaging compliance method is used, copies of the averaging calculations for each month as well as the data on the quantity of coating and thinners used to calculate the average.
- (b) To document compliance with Condition 5(1.3), the Permittee shall maintain records demonstrating actions have been taken to fulfill the Work Practice Implementation Plan.
- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of the Part 70 Operating Permit T037-7356-00100.

1.8 Reporting Requirements

- (a) An Initial Compliance Report to document compliance with Condition 5(1.1) and (1.2) and the Certification form, shall be submitted within sixty (60) days following the compliance date of November 21, 1997. The Initial Compliance Report must include data from the entire month that the compliance date falls.
- (b) A semi-annual Continuous Compliance Report to document compliance with Condition 5(1.1) and (1.2) and the Certification form, shall be submitted within thirty (30) days after the end of the six (6) months being reported.

For the first year following the compliance date, the Continuous Compliance Reports shall cover the following months:

 - (1) November 21, 1997 through May 20, 1998.
 - (2) May 21 through November 30, 1998.
 - (3) December 1 through December 31, 1998.
- (c) Following the first year of reporting, the semi-annual Continuous Compliance Report shall be submitted on a calendar year basis with the reporting periods ending June 30 and December 31.

(d) The reports required in (a), (b) and (c) of this condition shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

and

United States Environmental Protection Agency, Region V
Air and Radiation Division, Air Enforcement Branch - Indiana (AE-17J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

This existing source has submitted their Part 70 application T 037-7356-00100 on December 4, 1996. The equipment being reviewed under this permit shall be incorporated in the submitted Part 70 application.

An application or notification shall be submitted in accordance with 326 IAC 2 to the Office of Air Quality (OAQ) if the source proposes to construct new emission units, modify existing emission units, or otherwise modify the source.

Sincerely,

Signed by
Paul Dubenetzky, Chief
Permits Branch
Office of Air Quality

JF

Semi-annual report
Certification

cc: File - Dubois County
Dubois County Health Department
Air Compliance - Gene Kelso
Southwest Regional Office
Permit Tracking - Delisa Lee
Technical Support and Modeling - Michele Boner
Compliance Data Section - Karen Ampil
Part 70 Permit Reviewer - Melissa Groch
Part 70 Application File - T-037-7356-00100

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION**

**PART 70 OPERATING PERMIT
Semi-Annual Report**

VOC and VHAP usage - Wood Furniture NESHAP

Source Name: flexcel - Jasper 16th Street
Source Address: 1180 East 16th Street, Jasper, Indiana 47549
Mailing Address: 1180 East 16th Street, Jasper, Indiana 47549
Part 70 Permit No.: T037-7356-00100
Facility: Surface Coating in SB 10A and SB 13A
Parameter: VOC and VHAPs - NESHAP
Limit:
(1) Finishing operations -1.0 lb VHAP/lb Solids
(2) Thinners used for on-site formulation of washcoats, basecoats and enamels - 3% VHAP content by weight
(3) All other thinner mixtures - 10% VHAP content by weight
(4) Foam adhesives meeting the upholstered seating flammability requirements - 1.8 lb VHAP/lb Solids
(5) All other contact adhesives - 1.0 lb VHAP/lb Solids
(6) Strippable spray booth material - 0.8 pounds VOC per pound solids

YEAR: _____

Month	Finishing Operations (lb VHAP/lb Solid)	Thinners used for on-site formulation (% by weight)	All other thinner mixtures (% by weight)	Foam adhesives (upholstered) (lb VHAP/lb Solid)	Contact adhesives (lb VHAP/lb Solid)	Strippable spray booth material (lb VOC/lb Solid)
1						
2						
3						
4						
5						
6						

9 No deviation occurred in this six month period.

9 Deviation/s occurred in this six month period.
Deviation has been reported on:

Submitted by: _____
Title/Position: _____
Signature: _____
Date: _____
Phone: _____

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT OFFICE OF AIR QUALITY

PART 70 OPERATING PERMIT CERTIFICATION

Source Name: flexcel - Jasper 16th Street
Source Address: 1180 East 16th Street, Jasper, Indiana 47549
Mailing Address: 1180 East 16th Street, Jasper, Indiana 47549
Part 70 Permit No.: 037-16046-00100

This certification shall be included when submitting monitoring, testing reports/results or other documents as required by this permit.

Please check what document is being certified:

9 Annual Compliance Certification Letter

9 Test Result (specify) _____

9 Report (specify) _____

9 Notification (specify) _____

9 Affidavit (specify) _____

9 Other (specify) _____

I certify that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

Signature:

Printed Name:

Title/Position:

Phone:

Date:

**Indiana Department of Environmental Management
Office of Air Quality**

**Technical Support Document (TSD) for a
Part 70 Exemption**

Source Background and Description

Source Name:	Kimball Industrial Complex flexcel - Jasper 16th Street
Source Location:	1180 East 16th Street
County:	Dubois
SIC Code:	2517
Operation Permit No.:	T 037-7356-00100
Operation Permit Issuance Date:	Not yet issued
Exemption No.:	037-16046-00100
Permit Reviewer:	James Farrell

The Office of Air Quality (OAQ) has reviewed a modification application from flexcel - Jasper 16th Street relating to the following:

This new equipment will be incorporated into the pending Title V operating permit for this source.

Permitted Emission Units and Pollution Control Equipment

- (a) One (1) diptank, venting to a 24" stack. Capacity: 135 gallons waterbased dip per year.
- (b) One (1) twenty (20) foot spray booth, identified as SB 10A, modified in 2003 to a downdraft booth with one (1) 1.075 mmBTU/hr natural gas-fired air makeup unit and an enclosed thirty (30) foot flash-off tunnel with one (1) 1.075 mmBTU/hr natural gas-fired air makeup unit.
- (c) One (1) twenty (20) foot spray booth, identified as SB 13A, modified in 2003 to a downdraft booth with one (1) 1.075 mmBTU/hr natural gas-fired air makeup unit and an enclosed twenty (20) foot flash-off tunnel.

Unpermitted Emission Units and Pollution Control Equipment

There are no unpermitted facilities operating at this source during this review process.

Insignificant Activities

This source does not currently have any insignificant activities, as defined in 326 IAC 2-7-1(21).

Enforcement Issue

There are no enforcement actions pending.

Stack Summary

Stack ID	Operation	Height (feet)	Diameter (feet)	Flow Rate (acfm)	Temperature (°F)
Diptank	Diptank	8' 8"	2	10,000	75
10A	SB 10A	28' 6"	2.8	17,000	ambient
13A	SB 13A	28' 8"	3.5	20,000	ambient

Recommendation

The staff recommends to the Commissioner that the Part 70 Exemption be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

An application for the purposes of this review was received on September 3, 2002. Additional information was received on December 4, 2002, December 23, 2002 and February 19, 2003.

Emission Calculations

See Appendix A pages 1 through 3 of this document for detailed emissions calculations.

Potential To Emit

Pursuant to 326 IAC 2-1.1-1(16), Potential to Emit is defined as "the maximum capacity of a stationary source to emit any air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of a source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or type or amount of material combusted, stored, or processed shall be treated as part of its design if the limitation is enforceable by the U. S. EPA."

Pollutant	Potential To Emit (tons/year)
PM	0.06
PM-10	0.11
SO ₂	0.01
VOC	0.13
CO	1.19
NO _x	1.41

Note: For the purpose of determining Title V applicability for particulates, PM-10, not PM, is the regulated pollutant in consideration.

Actual Emissions

The following table shows the actual emissions from the combined 037-00100 source. This information reflects the 2001 OAQ emission data.

Pollutant	Actual Emissions (tons/year)
PM-10	3
SO ₂	1
VOC	414
CO	89
NO ₂	12

County Attainment Status

The source is located in Dubois County.

Pollutant	Status
PM-10	attainment
SO ₂	attainment
NO ₂	attainment
Ozone	attainment
CO	attainment
Lead	attainment

- (a) Volatile organic compounds (VOC) are precursors for the formation of ozone. Therefore, VOC emissions are considered when evaluating the rule applicability relating to the ozone standards. Dubois County has been designated as attainment or unclassifiable for ozone.
- (b) Dubois County has been classified as attainment or unclassifiable for all other criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 and 40 CFR 52.21.
- (c) Fugitive Emissions
Since this type of operation is not one of the 28 listed source categories under 326 IAC 2-2 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive PM emissions are not counted toward determination of PSD and Emission Offset applicability.

Federal Rule Applicability

- (a) There are no New Source Performance Standards (NSPS)(326 IAC 12 and 40 CFR Part 60) applicable to this source.
- (b) flexcel - Jasper 16th Street is subject to the National Emission Standards for Hazardous Air Pollutants, 326 IAC 14, (40 CFR 63.803, Subpart JJ).

Emission Limitations and Standards [326 IAC 2-7-5(1)]

1.1 General Provisions Relating to HAPs [326 IAC 20-1-1][40 CFR 63, Subpart A]

The provisions of 40 CFR 63, Subpart A - General Provisions, which are incorporated as 326 IAC 20-1-1, apply to the facility described in this section except when otherwise specified in 40 CFR 63, Subpart JJ.

1.2 Wood Furniture Manufacturing Operations NESHAP [326 IAC 20-14-1] [40 CFR Part 63, Subpart JJ]

- (a) The wood furniture manufacturing operations are subject to 40 CFR Part 63, Subpart JJ, which is incorporated by reference as 326 IAC 20-14-1, with a compliance date of November 21, 1997. A copy of this rule is attached.
- (b) Pursuant to 40 CFR 63, Subpart JJ, the wood furniture coating operations shall comply with the following conditions:
 - (1) Limit the Volatile Hazardous Air Pollutants (VHAP) emissions from finishing operations as follows:
 - (A) Achieve a weighted average volatile hazardous air pollutant (VHAP) content across all coatings of one (1.0) pound VHAP per pound solids; or

- (B) Use compliant finishing materials in which all stains, washcoats, sealers, topcoats, basecoats and enamels have a maximum VHAP content of one (1.0) pound VHAP per pound solid, as applied. Thinners used for on-site formulation of washcoats, basecoats, and enamels have a three percent (3.0%) maximum VHAP content by weight. All other thinners have a ten percent (10.0%) maximum VHAP content by weight; or
 - (C) Use a control device to limit emissions to one (1.0) pound VHAP per pound solids; or
 - (D) Use a combination of (A), (B), and (C).
- (2) Limit VHAP emissions contact adhesives as follows:
- (A) For foam adhesives used in products that meet the upholstered seating flammability requirements, the VHAP content shall not exceed one and eight tenths (1.8) pound VHAP per pound solids.
 - (B) For all other contact adhesives (except aerosols and contact adhesives applied to nonporous substrates) the VHAP content shall not exceed one (1.0) pound VHAP per pound solids.
 - (C) Use a control device to limit emissions to one (1.0) pound VHAP per pound solids.
- (3) The strippable spray booth material shall have a maximum VOC content of eight-tenths (0.8) pounds VOC per pound solids.

1.3 Work Practice Standards [40 CFR 63.803]

The owner or operator of an affected source subject to this subpart shall prepare and maintain a written work practice implementation plan within sixty (60) calendar days after the compliance date. The work practice implementation plan must define environmentally desirable work practices for each wood furniture manufacturing operation and at a minimum address each of the following work practice standards as defined under 40 CFR 63.803:

- (a) Operator training course.
- (b) Leak inspection and maintenance plan.
- (c) Cleaning and washoff solvent accounting system.
- (d) Chemical composition of cleaning and washoff solvents.
- (e) Spray booth cleaning.
- (f) Storage requirements.
- (g) Conventional air spray guns shall only be used under the circumstances defined under 40 CFR 63.803(h).
- (h) Line cleaning.
- (i) Gun cleaning.
- (j) Washoff operations.
- (k) Formulation assessment plan for finishing operations.

Compliance Determination Requirements [326 IAC 2-1.1-11] [326 IAC 2-7-6(1)]

1.4 Testing Requirements [326 IAC 2-1.1-11] [326 IAC 2-7-6(1)] [40 CFR 63]

- (a) Pursuant to 40 CFR 63, Subpart JJ, if the Permittee elects to demonstrate compliance using 63.804(a)(3) or 63.804(c)(2) or 63.804(d)(3) or 63.804(e)(2), performance testing must be conducted in accordance with 40 CFR 63, Subpart JJ and 326 IAC 3-6.

1.5 Volatile Organic Compounds (VOC)

Compliance with the VOC content and usage limitations contained in Condition 4 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) using formulation data supplied by the coating manufacturer.

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

1.6 Monitoring

- (a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, daily observations shall be made of the overspray while one or more of the booths are in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit. The Section C - Compliance Monitoring Plan - Failure to Take Response Steps will be issued in the Part 70 Operating Permit T037-7356-00100.
- (b) Weekly inspections shall be performed of the coating emissions from the stack and the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when a noticeable change in overspray emissions, or evidence of overspray emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit. The Section C - Compliance Monitoring Plan - Failure to Take Response Steps will be issued in the Part 70 Operating Permit T037-7356-00100.
- (c) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan. The Preventive Maintenance Plan will be issued in the Part 70 Operating Permit T037-7356-00100.

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

1.7 Record Keeping Requirements

- (a) To document compliance with Condition (1.1) and (1.2), the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be complete and sufficient to establish compliance with the VHAP usage limits established in Condition (1.2).
 - (1) Certified Product Data Sheet for each finishing material, thinner, contact adhesive and strippable booth coating.
 - (2) The HAP content in pounds of VHAP per pounds of solids, as applied, for all finishing materials and contact adhesives used.
 - (3) The VOC content in pounds of VOC per pounds of solids, as applied, for each strippable coating used.
 - (4) The VHAP content in weight percent of each thinner used.
 - (5) When the averaging compliance method is used, copies of the averaging calculations for each month as well as the data on the quantity of coating and thinners used to calculate the average.

- (b) To document compliance with Condition (1.3), the Permittee shall maintain records demonstrating actions have been taken to fulfill the Work Practice Implementation Plan.
- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of the Part 70 Operating Permit T037-7356-00100.

1.8 Reporting Requirements

- (a) An Initial Compliance Report to document compliance with Condition (1.1) and (1.2) and the Certification form, shall be submitted within sixty (60) days following the compliance date of November 21, 1997 . The Initial Compliance Report must include data from the entire month that the compliance date falls.
- (b) A semi-annual Continuous Compliance Report to document compliance with Condition (1.1) and (1.2) and the Certification form, shall be submitted within thirty (30) days after the end of the six (6) months being reported.

For the first year following the compliance date, the Continuous Compliance Reports shall cover the following months:

- (1) November 21, 1997 through May 20, 1998.
- (2) May 21 through November 30, 1998.
- (3) December 1 through December 31, 1998.
- (c) Following the first year of reporting, the semi-annual Continuous Compliance Report shall be submitted on a calendar year basis with the reporting periods ending June 30 and December 31.
- (d) The reports required in (a), (b) and (c) of this condition shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

and

United States Environmental Protection Agency, Region V
Air and Radiation Division, Air Enforcement Branch - Indiana (AE-17J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

State Rule Applicability - Entire Source

326 IAC 1-6-3 (Preventive Maintenance Plan)

The source has submitted a Preventive Maintenance Plan (PMP) on December 4, 1996. This PMP has been verified to fulfill the requirements of 326 IAC 1-6-3 (Preventive Maintenance Plan).

326 IAC 2-6 (Emission Reporting)

This source is subject to 326 IAC 2-6 (Emission Reporting), because it has the potential to emit more than one hundred (100) tons per year of VOCs. Pursuant to this rule, the owner/operator of the source must annually submit an emission statement for the source. The annual statement must be received by July 1 of each year and contain the minimum requirement as specified in 326 IAC 2-6-4. The submittal should cover the period defined in 326 IAC 2-6-2(8)(Emission Statement Operating Year).

326 IAC 5-1 (Opacity Limitations)

Pursuant to 326 IAC 5-1-2 (Opacity Limitations) except as provided in 326 IAC 5-1-3 (Temporary Alternate Opacity Limitations), opacity shall meet the following:

- (a) Opacity shall not exceed an average of thirty percent (30%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of 15 minutes (sixty (60) readings) in a 6-hour period as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor in a six (6) hour period.

State Rule Applicability - Individual Facilities

326 IAC 5-1 (Opacity Limitations)

Pursuant to 326 IAC 5-1-2 (Opacity Limitations) except as provided in 326 IAC 5-1-3 (Temporary Alternate Opacity Limitations), opacity shall meet the following:

- (a) Opacity shall not exceed an average of thirty percent (30%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of 15 minutes (sixty (60) readings) in a 6-hour period as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor in a six (6) hour period.

326 IAC 6-1-2 (Particulate Emissions Limitations: General Sources)

Pursuant to 326 IAC 6-1-2(a) (Particulate Emissions Limitations: General Sources), facilities shall not allow or permit discharge to the atmosphere of any gases which contain particulate matter in excess of 0.07 gram per dry standard cubic meter (g/dscm)(0.03 grain per dry standard cubic foot (dscf)).

326 IAC 6-3-2 (Process Operations)

The particulate matter (PM) from the SB 10A and SB 13A shall be limited by the following:

Interpolation and extrapolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67} \quad \text{where } E = \text{rate of emission in pounds per hour and} \\ P = \text{process weight rate in tons per hour}$$

The dry filters shall be in operation at all times the SB 10A and SB 13A is in operation, in order to comply with this limit.

326 IAC 8-2-12 (Wood Furniture and Cabinet Coating)

Pursuant to 326 IAC 8-2-12 (Wood Furniture and Cabinet Coating), the surface coating applied to wood furniture and cabinets shall utilize one of the following application methods:

- Airless Spray Application
- Air Assisted Airless Spray Application
- Electrostatic Spray Application
- Electrostatic Bell or Disc Application
- Heated Airless Spray Application

Roller Coating
Brush or Wipe Application
Dip-and-Drain Application

High Volume Low Pressure (HVLP) Spray Application is an accepted alternative method of application for Air Assisted Airless Spray Application. HVLP spray is the technology used to apply coating to substrate by means of coating application equipment which operates between one-tenth (0.1) and ten (10) pounds per square inch gauge (psig) air pressure measured dynamically at the center of the air cap and at the air horns of the spray systems.

Compliance Requirements

Permits issued under 326 IAC 2-7 are required to ensure that sources can demonstrate compliance with applicable state and federal rules on a more or less continuous basis. All state and federal rules contain compliance provisions, however, these provisions do not always fulfill the requirement for a more or less continuous demonstration. When this occurs IDEM, OAQ, in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-7-5. As a result, compliance requirements are divided into two sections: Compliance Determination Requirements and Compliance Monitoring Requirements.

Compliance Determination Requirements in Section D of the permit are those conditions that are found more or less directly within state and federal rules and the violation of which serves as grounds for enforcement action. If these conditions are not sufficient to demonstrate continuous compliance, they will be supplemented with Compliance Monitoring Requirements, also Section D of the permit. Unlike Compliance Determination Requirements, failure to meet Compliance Monitoring conditions would serve as a trigger for corrective actions and not grounds for enforcement action. However, a violation in relation to a compliance monitoring condition will arise through a source's failure to take the appropriate corrective actions within a specific time period.

Conclusion

The operation of this proposed modification shall be subject to the conditions of the attached proposed Part 70 Exemption No. 037-16046-00100.